

Material	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Designated portions of Valeant's Letter to The Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.) (3:15-cv-07658 Dkt. No. 1039, "Letter")	The Letter contains information derived from documents and/or deposition testimony that Plaintiffs designated as "Confidential" pursuant to the confidentiality orders entered in these actions (<i>see, e.g.</i> , 3:15-cv-07658 Dkt. No. 244).	Plaintiffs designated the documents and/or deposition testimony as "Confidential."	Given the nature of arguments made by Valeant in the Letter, there is no less restrictive alternative available to Valeant than to rely upon the confidentially-designated documents and/or deposition testimony while simultaneously following the terms of the confidentiality orders entered in these actions (<i>see, e.g.</i> , 3:15-cv-07658 Dkt. No. 244).	The Court has previously entered a confidentiality order in every related action, allowing the parties to use a confidentiality designation for discovery materials that contain "non-public, confidential, proprietary, customer, client, or commercially sensitive information." <i>See, e.g.</i> , 3:15-cv-07568 Dkt. No. 244.	Valeant is not aware of any party that plans to oppose this motion.
Exhibit D attached to the Letter (Relevant Portions of Plaintiffs' May 31, 2022 Responses and Objections To Defendants' First	Plaintiffs designated the responses and objections as "Confidential" pursuant to the confidentiality	Plaintiffs designated the responses and objections as "Confidential."	Given the nature of arguments made by Valeant in the Letter, there is no less restrictive alternative available to Valeant than to	The Court has previously entered a confidentiality order in every related action, allowing the parties to use a	Valeant is not aware of any party that plans to oppose this motion.

Set of Interrogatories)	orders entered in these actions (<i>see,</i> <i>e.g.</i> , 3:15-cv-07658 Dkt. No. 244).		rely upon the confidentially- designated deposition testimony while simultaneously following the terms of the confidentiality orders entered in these actions (<i>see,</i> <i>e.g.</i> , 3:15-cv-07658 Dkt. No. 244).	confidentiality designation for discovery materials that contain “non- public, confidential, proprietary, customer, client, or commercially sensitive information.” <i>See,</i> <i>e.g.</i> , 3:15-cv-07568 Dkt. No. 244.	
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